



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2009 MAIN STREET, COLLINSVILLE, ILLINOIS 62234

THOMAS V. SKINNER, DIRECTOR

II  
4/16/99

April 15, 1999

Mr. Kevin Turner  
United States Environmental Protection Agency  
Region V  
c/o Crab Orchard National Wildlife Refuge  
8588 Route 148  
Marion, Illinois 62959

EPA Region 5 Records Ctr.



379678

Dear Kevin:

Per your April 5, 1999 letter, I have enclosed a list of ARARs for the State of Illinois applicable to the upcoming removal action at the Quality Cleaners site located in Belleville, Illinois. Please forward copies of any Action Memo's, Removal Action Reports, weekly POLREPS and any other relevant site information to Tom Miller, OSC in the Collinsville Regional Office.

Tom will be available to assist you with any Agency File information request or any field assistance if necessary. If this particular removal action goes beyond the original scope and additional ARAR information is required, please contact Tom Miller at 618/346-5120 or myself at 217/782-6761.

In Illinois, our RCRA regulations are essentially identical to the Federal RCRA regulations. The essential difference between the Federal and State ARARs for solid wastes, is the classification of Special Waste in Illinois.

The Agency appreciates the assistance and prompt manner in which our request for removal actions are handled by the U.S. EPA Region V Personnel.

Sincerely,

*Thomas V. Skinner*

*Bruce Everett*

Bruce Everett  
Illinois Environmental Protection Agency  
Bureau of Land  
Remedial Project Management Section  
Site Assessment Unit

attachments

**STATE of ILLINOIS ARARs**  
**for**  
**IMMEDIATE REMOVALS of CONTAINERS**

<b>Regulatory Citation</b>	<b>Requirement</b>
	<b>Determine the Regulatory Classification of the material</b>
35 IAC 722.111 (40 CFR 262.11)	The generator of a solid waste must determine whether it is a hazardous waste.
35 IAC 808.110	The waste will probably be classified as a Special Waste. Special wastes are hazardous wastes, industrial process wastes, and pollution control wastes. Pollution control wastes include contaminated media.
	<b>Obtain IEPA &amp; USEPA Identification Numbers</b>
35 IAC 722.112 (40 CFR 262.12)	A generator must obtain a USEPA identification number prior to transporting hazardous waste off-site.
35 IAC 809.501	A generator must obtain an IEPA identification number in order to properly complete an Illinois manifest.
	<b>Transportation of Wastes Off-Site</b>
35 IAC 723.120 (40 CFR 263.20)	Hazardous waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.501	Special waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.201	All vehicles that haul special waste on public highways in Illinois must have a Special Waste Hauling Permit.
	<b>On-Site Management of Wastes</b>

**STATE of ILLINOIS ARARs**  
**for**  
**IMMEDIATE REMOVALS of CONTAINERS**

<b>Regulatory Citation</b>	<b>Requirement</b>
35 IAC 722.134 (40 CFR 262.34)	<p>Containers of hazardous waste can be stored on-site for less than 90 days without obtaining a permit or interim status provided that they are managed in accordance with the requirements at 35 IAC Part 725, Subpart I:</p> <ul style="list-style-type: none"> <li>- the containers must be in good condition (non-leaking),</li> <li>- the containers must be compatible with the wastes placed in them,</li> <li>- the containers must always be closed except when it is necessary to add or remove waste,</li> <li>- the containers must not be opened, or managed in a way that may cause them to rupture or leak,</li> <li>- the containers must be inspected weekly,</li> <li>- incompatible wastes must not be placed in the same container,</li> <li>- a container of waste that is incompatible with other wastes must be separated from the other wastes,</li> <li>- containers of ignitable or reactive waste must be located at least 50 feet from the property line,</li> </ul>
35 IAC 722.134 (40 CFR 262.34)	<p>The 90 day exclusion only applies to wastes that are managed in containers, tanks, drip pads or containment buildings. Hazardous waste that is placed on the ground is subject to all of the regulations for a waste pile as soon as it is placed on the ground.</p>